All of the amateur bands up into the VHF region have a CW sub-band. It only makes reasonable sense to also have a CW sub-band on 160 for the same reasons there are sub-bands for CW on all the other bands. Given the weak signal contacts that are often made world wide on 160 meters using CW it makes even more sense to have a CW sub-band on this band than some of the others. This is demonstrated by a DX window in the CW portion. I support a CW Sub-band on 160 meters.